

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re:	PROMESA
	Title III
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	(Jointly Administered)
Debtors. ¹	

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**INFORMATIVE
MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD REGARDING MARCH 23–24, 2022 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for March 23–24, 2022, Omnibus Hearing* [Case No. 17-3283, ECF No. 20323], the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

1. The following parties will appear on behalf of the Oversight Board: (i) Martin J. Bienenstock, mbienenstock@proskauer.com; (ii) Brian S. Rosen, brosen@proskauer.com; (iii) Paul V. Possinger, ppossinger@proskauer.com; and (iv) Laura Stafford, lstafford@proskauer.com of Proskauer Rose LLP.

2. Martin J. Bienenstock and Brian S. Rosen of Proskauer Rose LLP will appear to address questions and comments, if any, related to the Oversight Board's status report.

3. Paul V. Possinger of Proskauer Rose LLP will appear to address questions and comments, if any, related to the *Motion of Puerto Rico Electric Power Authority Pursuant to Bankruptcy Code Section 503(b), PROMESA Section 315(a)(3), and Bankruptcy Rule 9019 for Order Approving Settlement Agreement with Whitefish Energy Holdings, LLC and Granting Related Relief* [Case No. 17-3283, ECF No. 20242].

4. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the *Three Hundred Thirty-Seventh Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Pension-Related Claims Asserted Against the Incorrect Debtor* [Case No. 17-3283, ECF No. 17081] (the "Three Hundred Thirty-Seventh Omnibus Objection") with respect to Proof of Claim No. 121773, the *Three Hundred Forty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Public Buildings Authority and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Cross-Debtor Duplicate Claims* [Case No. 17-3283, ECF No. 17105] (the "Three Hundred Forty-First Omnibus Objection") with respect to Proof of Claim No. 127701, and the *Three Hundred Forty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to*

Misclassified Claims [Case No. 17-3283, ECF No. 17108] (the “Three Hundred Forty-Fifth Omnibus Objection”) with respect to Proof of Claim Nos. 129809, 139753, 121773, as well as any and all related objections, responses, statements, joinders, and replies to the Three Hundred Thirty-Seventh Omnibus Objection, Three Hundred Forty-First Omnibus Objection, and Three Hundred Forty-Fifth Omnibus Objection.

5. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the Three Hundred Forty-First Omnibus Objection with respect to Proof of Claim No. 12310 and the Three Hundred Forty-Fifth Omnibus Objection with respect to Proof of Claim No. 12337, as well as any and all related objections, responses, statements, joinders, and replies to the Three Hundred Forty-First Omnibus Objection, and Three Hundred Forty-Fifth Omnibus Objection.

6. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the Three Hundred Forty-First Omnibus Objection with respect to Proof of Claim No. 12526 and the Three Hundred Forty-Fifth Omnibus Objection with respect to Proof of Claim No. 12312, as well as any and all related objections, responses, statements, joinders, and replies to the Three Hundred Forty-First Omnibus Objection and Three Hundred Forty-Fifth Omnibus Objection.

7. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the Three Hundred Forty-Fifth Omnibus Objection with respect to Proof of Claim Nos. 24315 and 20600, as well as any and all related objections, responses, statements, joinders, and replies to the Three Hundred Forty-Fifth Omnibus Objection.

8. Brian S. Rosen and Laura Stafford of Proskauer Rose LLP will appear and seek to be heard on the *Four Hundred Seventeenth Omnibus Objection (Substantive)* of the

Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors [Case No. 17-3283, ECF No. 20043] (the “Four Hundred Seventeenth Omnibus Objection”) with respect to Proof of Claim No. 179673, as well as any and all related objections, responses, statements, joinders, and replies to the Four Hundred Seventeenth Omnibus Objection.

9. Martin J. Bienenstock, Brian S. Rosen, Paul V. Possinger, and Laura Stafford, reserve the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the interests of the Oversight Board or any of the Debtors in these Title III cases.

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WHEREFORE, the parties respectfully request that the Court take notice of the foregoing.

Dated: March 17, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock
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EXHIBIT A

PARTY APPEARANCE COVER SHEET

PARTY APPEARANCE COVER SHEET

Name of Party	Financial Oversight and Management Board for Puerto Rico
Party Name Abbreviation (For Use with Zoom)	FOMB
Omnibus Hearing Participant	
Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):	
<ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney's Notice of Appearance • Zoom Screen Name 	<p>Martin J. Bienenstock mbienenstock@proskauer.com Proskauer Rose LLP 212-969-4530 Docket Entry No. 90 FOMB/ Bienenstock, Martin/ Proskauer Rose LLP</p>
	<p>Brian S. Rosen brosen@proskauer.com Proskauer Rose LLP 212-969-3380 Docket Entry No. 1902 FOMB/ Rosen, Brian/ Proskauer Rose LLP</p>
	<p>Paul V. Possinger ppossinger@proskauer.com Proskauer Rose LLP 312-962-3570 Docket Entry No. 90 FOMB/ Possinger, Paul/ Proskauer Rose LLP</p>
	<p>Laura Stafford lstafford@proskauer.com Proskauer Rose LLP 617-526-9714 Docket Entry No. 4967 FOMB/ Stafford, Laura/ Proskauer Rose LLP</p>